

E
X
H
I
B
I
T

13

Elizabeth G. Eager

From: Elizabeth G. Eager
Sent: Tuesday, April 20, 2010 11:16 AM
To: 'Dowd, Brendan'; 'Elias, Brad'
Cc: Steven J. Rosenwasser; Nicole G. Iannarone
Subject: TASER Litigation: Traders Documents

Brendan,

On August 12, 2009, the parties entered into a stipulation regarding the identification and production of documents from traders. Pursuant to that stipulation, Plaintiffs request that BAS identify and produce responsive documents from the individuals associated with the following trading numbers: 167, 45 and 04X. Plaintiffs also request that responsive documents from Kevin Sharkey be produced.

Plaintiffs understand the numbers referenced above may represent the head trader of a trading desk and that there could be multiple assistants to the head trader that have significant relevant communications with clients and departments within each defendant's operations. Therefore, we request that for each of these trading desks identified, you identify the persons reasonably likely to have responsive information, you search those persons electronically-stored information and produce any responsive materials.

Pursuant to the stipulation, responsive information is due within 30 calendar days from today. Plaintiffs explicitly reserve the right to request information about additional traders (we are providing a partial list now in order to expedite the process, but we expect our continuing review is likely to identify other traders).

Thank you,
Liz Eager

Elizabeth G. Eager, Esq.
Bondurant, Mixson & Elmore, LLP
3900 One Atlantic Center
1201 West Peachtree Street, N.W.
Atlanta, Georgia 30309
404-881-4186 (direct)
404-881-4111 (fax)

Confidentiality Notice: This message is being sent by or on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.